Paula Kritzman, Individually and on behalf of all others similarly situated,

Civil Action No. 06-00233 (LAK) Of

Plaintiff,

ν.

NOTICE OF MOTION TO ADMIT COUNSEL MARK K. GYANDOH PRO HAC VICE

AMERICAN EXPRESS RETIREMENT PLAN, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS COMPANY EMPLOYEE BENEFITS ADMINISTRATION COMMITTEE, JOHN DOES 1-100

Defendants.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #:

DATE FILED:

To: All Counsel

PLEASE TAKE NOTICE that upon the annexed affirmations of Curtis V. Trinko and Mark K. Gyandoh in support of this motion and the Certificate of Good Standing annexed thereto, we will move this Court before the Honorable Lewis A. Kaplan at the United State Courthouse of the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, an associate of the law firm of Schiffrin & Barroway, LLP and a member in good standing of the Bar of the State of Pennsylvania, as attorney pro hac vice to argue or try this case in whole or in part as counsel.

Dated: May \_\_\_\_\_, 2006

Respectfully submitted,

SO ORDERED

LAW OFFICES OF CURTIS V. TRINKO, LLP

Curtis V. Trinko (CT-1838)

16 West 46th Street, 7th Floor New York, new York 10036

Tel: (212) 490-9550 Fax: (212) 986-0158

Email: ctrinko@trinko.com